



October 10, 2013

Mr. Keith Wallace, Project Manager
California Department of Water Resources
Division of Integrated Regional Water Management
Financial Assistance Branch
Post Office Box 942836
Sacramento, CA 94236



Subject: Comments on Draft Proposition 84-Round 2 Implementation Grant Funding Recommendations

Dear Mr. Wallace,



Our organizations including disadvantaged community (DAC), academic, and non-governmental organizations (NGOs) that are involved in the San Diego Integrated Regional Water Management (IRWM) Program have reviewed the California Department of Water Resources (DWR) draft funding recommendations for Proposition 84-Round 2 implementation grants. We are disappointed and frustrated that our grant proposal was poorly scored, and that DWR has recommended funding of only 50% of the grant we requested. The draft recommendation by DWR has particular implications to DACs, academic interests, and NGOs involved in the San Diego IRWM Program, which threaten our organizations' participation in the IRWM Program and therefore the IRWM Program itself. For the reasons outlined below, we believe that the application deserves a higher score from DWR and **100%** funding.



First, we are concerned that DWR's scoring of grant applications lacks transparency, consistency, and validity, which puts the entire IRWM Program into question. We firmly believe that the San Diego's Round 2 grant application includes detailed, accurate, and responsive information. We disagree with many of the DWR statements in the evaluation and sincerely wish there had been a process to answer your questions prior to the draft grant awards. Despite the inclusion of an overwhelming amount of information, it seems as though DWR has failed to understand some of our projects at a basic level and has also overlooked the vast amount of supporting materials provided. Findings by DWR in the evaluation are particularly concerning considering that the level of detail provided in San Diego's Round 2 application is in line with previous grant rounds that received high ratings from DWR in the past. This inconsistency in scoring compared to previous applications, in conjunction with the evaluation's subjective remarks, leads us to believe that DWR's evaluation process is completely arbitrary and that our good-faith participation in this program (including intensive grant preparation) are for naught.

Specifically, the San Diego Regional Water Management Group has developed a detailed response to DWR's Proposal Evaluation explaining where in the application and supporting materials all of the requested information is. In most cases, information was included in the proposal but somehow missed or misunderstood by DWR's reviewers. Key inaccuracies in the proposal review included:

- 1) Proposal and supporting documents explained that *North San Diego County Regional Recycled Water Project* treatment plants do, in fact, have tertiary treatment capacity. This misunderstanding reduced our score in 3 separate sections and should be rectified.
- 2) Proposal and supporting documents explained that flood damage reduction would be assured through the *Chollas Creek Integration Project*, via a FEMA NFHL Floodplain Exhibit and a HEC-RAS analysis. This misunderstanding reduced our score in 3 separate sections and should be rectified.

We request that the proposal be rescored in light of the substantial information presented in the application. The San Diego region's application was detailed, accurate, and responsive to DWR's solicitation and deserves 100% of the funding request.

Second, there is increasing dissatisfaction among our organizations regarding DWR's bureaucratic administration of the IRWM Program; this dissatisfaction has been reinforced by DWR's recommendation to only fund San Diego's Round 2 application by 50%. The San Diego IRWM Program has invested significant resources in a process that invites organizations like ours to join forces with public agencies to design and implement projects from an integrated perspective. This integration process took place to develop and decide which projects would be included in the Round 2 application, and it is inappropriate for DWR to override the Region's selection process and fund our Region at a lower level based on a subjective scoring evaluation. This decision by DWR further reinforces our increasing belief that the IRWM Program is becoming too volatile to participate in. This volatility, in part due to grant award uncertainty even in regions with established funding agreements and in part due to the poor administration of grant contracts once they're awarded, is dissuading our organizations from participating. DWR's reimbursement and contracting ability has severely disabled the ability and desire of NGOs, academic organizations, and DACs to participate in IRWM grants. Add to that the extensive requirements needed to prepare a grant application and the substantial local effort required to select projects, and small NGOs just simply aren't equipped to stay 'at the table'.

Despite the strong commitment by the San Diego IRWM Program to embrace integrated planning and include all stakeholders, funding decisions like the Round 2 draft recommendation add to the growing concerns of our organizations about our ability and interest in participating. DWR's administration of the IRWM Grant Program, including the proposal solicitation and evaluation processes, is in need of significant reform to assure the longevity of IRWM for all stakeholders and particularly for NGO, academic, and DAC stakeholders.

We appreciate the ability to comment and hope that DWR give serious consideration to the concerns raised in this comment letter. Most importantly, please rescore the San Diego Round 2 application and award the region 100% of our requested grant funding.

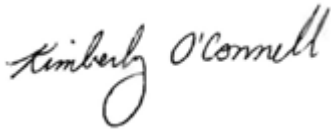
Sincerely,



Travis Pritchard
San Diego Coastkeeper



Rob Hutsel
San Diego River Park Foundation



Kimberly O'Connell
University of California, San Diego



Jack Monger
Industrial Environmental Association



Eric Larson
San Diego County Farm Bureau



Jennifer Hazard
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